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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	
	:	
WORLDCOM, INC., <u>et al.</u>,	:	Chapter 11 Case No.
	:	02-13533 (AJG)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
MCI WORLDCOM	:	
COMMUNICATIONS, INC. and	:	
WORLDCOM, INC.	:	
	:	
Plaintiffs,	:	Adv. Pro. No. 05-3143 (AJG)
	:	
v.	:	
	:	
HSG/ATN, INC.,	:	
	:	
Defendant.	:	

**APPELLEE REORGANIZED DEBTORS' COUNTER
DESIGNATION OF THE RECORD**

Appellee Reorganized Debtors, pursuant to Federal Rule of Bankruptcy Procedure 8006,
designate the following additional items (including any exhibits attached to such items) to be

included in the record concerning Appellant HSG/ATN, Inc.'s appeal from (i) the Order Granting Reorganized Debtors' Motion for Summary Judgment With Respect to Claim Nos. 38580 and 38583 Filed by HSG/ATN, Inc., and Granting, in Part, HSG/ATN, Inc.'s Motion for Summary Judgment, which was entered on March 22, 2007; and (ii) the Order Denying Motion of HSG/ATN, Inc. for Allowance and Payment of an Administrative Claim, which was entered on May 11, 2004:

Item	Date Filed	Docket Entry No. of 02-13533	Description
1	11/21/2003		Proof of Claim No. 36482 ¹
2	9/26/2005		Proof of Claim No. 38580
3	9/27/2005		Proof of Claim No. 38583
4	6/16/2003	6581	Notice of Agenda of Matters Scheduled for Hearing on June 17, 2003
5			Transcript of Hearing Held on June 17, 2003 concerning Motion for Allowance and Payment of Administrative Claim by HSG/ATN, Inc. ²
6	06/30/2003	6966	Notice of Agenda of Matters Scheduled for Hearing on July 1, 2003
7			Transcript of Hearing Held on July 1, 2003 concerning Motion for Allowance and Payment of Administrative Claim by HSG/ATN, Inc.
8	10/13/2004	12838	Objection Debtors' 59th Omnibus Objection to Proofs of Claim [Third Party Agents/External Commission Claims]

¹ Because Proofs of Claim Nos. 36482, 38580 and 38583 have not been filed on the CM/ECF system in Case No. 02-13533 or Adv. Pro. No. 05-3143, pursuant to Local Rule 8007-1(a), they are attached to this designation as Exhibits A, B and C respectively.

² Counsel for Reorganized Debtors have requested that Veritext LLC send a copy of the transcripts from the hearings held on June 17, 2003 and July 1, 2003 concerning the Motion for Allowance and Payment of Administrative Claim filed by HSG/ATN, Inc. to the Court so that such transcripts can be filed on the CM/ECF system.

9	11/24/2004	14028	Affidavit of Service of Notice of Hearing on Debtors' Objection to HSG/ATN, Inc. Claim No. 38458
10	12/17/2004	14596	Notice of Withdrawal of Notice of Appearance of Richard L. Koral as attorney for HSG/ATN, Inc. and termination of request for service
11	01/19/2005	14905	Scheduling Order signed on 1/18/2005 with respect to the Debtors' objection to claim nos. 36482 and 38458 filed by HSG/ATN, Inc.
12	05/16/2005	16027	Affidavit of Service of Debtors' Rule 26 Initial Disclosures to HSG/ATN (claim nos. 36482 and 38458) filed by Angela G. Heppner on behalf of WorldCom, Inc.
13	06/17/2005	16254	Affidavit of Service of Rule 26(a)(1) Documents to HSG/ATN, Inc. (claim nos. 36482 and 38458)
14	06/17/2005	16255	Affidavit of Service of Rule 26(a)(1) Supplemental Disclosure to HSG/ATN, Inc. (claim nos. 36482 and 38458)
15	08/15/2005	16761	Notice of Appearance filed by Eric Fisher on behalf of HSG/ATN, Inc.
16	08/15/2005	16762	Stipulation /Notice of Substitution of Counsel
17	09/14/2005	17079	Affidavit of Service Reorganized Debtors' September 14, 2005 Interrogatories, Request for Production of Documents and Requests for Admission to HSG/ATN, Inc. Regarding Claim Nos. 36482 and 38458-59th Omnibus Claim Objections
18	10/04/2005	17263	Agreed Amended Scheduling Order signed on 10/4/2005 with respect to debtors' objection to claim nos. 36482 and 38458 filed by HSG/ATN, Inc.
19	10/05/2005	17305	Certificate of Service of Order Compelling Attendance at Settlement Conference relating to HSG/ATN, Inc.

20	10/31/2005	17483	Affidavit of Service of Reorganized Debtors' Rule 26(a)(2) Expert Disclosures with Respect to Claim Nos. 36482 and 38458
21	12/21/2005	17757	Affidavit of Service of Reorganized Debtors' Responses to HSG/ATN, Inc.'s August 30, 2005 Request for the Production of Documents and Responses to HSG/ATN, Inc.'s November 14, 2005 Second Set of Interrogatories
22	01/13/2006	17825	Notice of Substitution of Counsel
23	01/13/2006	17826	Notice of Agenda of Matters Scheduled for Hearing on January 17, 2006
24	01/23/2006	17855	Second Agreed Amended Scheduling Order signed on 1/23/2006 with respect to debtors' objections to claim nos. 36482, 38458, 38580 and 38583 filed by HSG/ATN, Inc.
25	03/14/2006	18007	So Ordered Stipulation and Consent Order signed on 3/14/2006 concerning HSG/ATN, Inc.
26	04/06/2006	18142	Affidavit of Service by Kandra Payne of (i) Memorandum of Law in Opposition to Reorganized Debtors' Motion for Summary Judgment with Respect to Claims Filed by HSG/ATN, Inc., (ii) Counter-Statement of Material Facts Pursuant to Local Bankruptcy Rule 7056-1, (iii) Declaration of Eric B. Fisher Pursuant to Fed. R. Civ. Proc. 56(f), and (iv) Declaration of Raejean M. Battin in Opposition to Debtors' Motion for Summary Judgment
27	04/07/2006	18150	Affidavit of Service Amended Affidavit of Service by Kandra Payne of (i) Memorandum of Law in Opposition to Reorganized Debtors' Motion for Summary Judgment with Respect to Claims Filed by HSG/ATN, Inc., (ii) Counter-Statement of Material Facts Pursuant to Local Bankruptcy Rule 7056-1, (iii) Declaration of Eric B. Fisher Pursuant to Fed. R. Civ. Proc. 56(f), and (iv) Declaration of Raejean M. Battin in Opposition to Debtors' Motion for Summary Judgment

28	4/18/2006	18183	Reply to HSG's Opposition to MCI's Motion for Summary Judgment
29	08/21/2006	18455	Fourth Agreed Amended Scheduling Order signed on 8/21/2006 with respect to debtors' objections to claim nos. 36482, 38458, 38580 and 38583 filed by HSG/ATN, Inc.
30	09/25/2006	18525	Notice of Agenda of Matters Scheduled for Hearing on September 26, 2006
31	11/20/2006	18619	Letter re: Amended Scheduling Orders filed by Eric Fisher on Behalf of HSG/ATN, Inc.
32	12/14/2006	18632	Fifth Agreed Amended Scheduling Order signed on 12/12/2006 with respect to debtors' objections to claim nos. 36482, 38458, 38580 and 38583 filed by HSG/ATN, Inc.
33	01/22/2007	18680	Notice of Agenda of Matters Scheduled for Hearing on January 23, 2007
34	2/14/2007	18715	Opinion signed on 2/14/2007 regarding motions for summary judgment

Respectfully submitted,

/s/ Angela G. Heppner
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Attorneys for Appellee Reorganized Debtors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of April, 2007, the foregoing document was sent via first class U.S. Mail, postage pre-paid, to:

Eric B. Fisher
Morgenstern Jacobs & Blue, LLC
885 Third Avenue
New York, NY 10022
Attorney for HSG/ATN, Inc.

/s/ Angela G. Heppner
Attorneys for Appellee Reorganized Debtors